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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NO. CR 15-0319-001 RS
)	
v.)	UNITED STATES' MOTION TO TERMINATE
)	DEFENDANT'S MOTION FOR SELF-
SHAUN W. BRIDGES)	SURRENDER AND MOTION TO UNSEAL
(A/K/A "NUMBER 13"),)	ARREST WARRANT AND PROPOSED ORDER
)	
Defendant.)	
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1 The government submits the instant filing to terminate the defendant's pending motion for self-
2 surrender that was filed yesterday. Pursuant to the warrant issued under seal by this Court last night for
3 the arrest of Shaun Bridges, the government hereby apprises the Court that Bridges was successfully
4 arrested without incident this morning. During the execution that warrant, and based on facts that
5 remain under seal before this Court, the government recovered the following items: two "pelican style"
6 bags which contained: identity documents; a passport card in Bridges' name; a notarized copy of
7 Bridges' passport; corporate records for at least 3 different offshore entities ranging from Nevis to
8 Belize to Mauritius, including one that Bridges created on October 28, 2015 after he had pleaded guilty
9 in this case; a Samsung cell phone; and a thumb drive. Also located in those bags were documents
10 relating to his wife's, Ariana Esposito's, attempts to obtain citizenship in another country. Government
11 agents also found a MacBook with the serial number scratched off, an ipad tucked between a bedroom
12 mattress, and bulletproof vests, at least one of which had Secret Service markings and thus is believed to
13 have been stolen from the government. It should be noted that this was not the sum of evidence agents
14 recovered – rather, the government is only including facts here that it believes are relevant to the
15 defendant's risk of flight.

16 In light of the defendant's arrest, and possibly for other reasons contained in filings that remain
17 under seal, BOP has apprised government counsel that it is in the process of redesignating the defendant
18 to another BOP facility. Today, the defendant filed a motion in the District of Maryland for his release
19 from custody and self-surrender to a BOP facility. His motion was denied by Magistrate Judge Sullivan
20 based, in part, on the arrest warrant issued by this Court. Defendant, therefore, remains in the custody of
21 the USMS pending BOP's redesignation. The government submits that his continued post-sentencing
22 detention in the custody of the USMS is appropriate under 18 U.S.C. § 3143, and all of the foregoing,
23 and given all of the additional facts contained in the under seal filings of yesterday.

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1 In light of the defendant's arrest, the government moves to unseal the defendant's arrest warrant.
2 However, the government seeks to have the facts filed in support of that warrant (and the attached
3 Exhibit) remain under seal given that they discuss new criminal conduct that the government is currently
4 investigating. A Proposed Order is attached.

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6 DATED: January 28, 2016

Respectfully submitted,

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8 BRIAN J. STRETCH
Acting United States Attorney

9
10 /s/
KATHRYN HAUN
STEPHANIE HINDS
11 WILLIAM FRENTZEN
Assistant United States Attorneys

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13 RICHARD B. EVANS
Public Integrity Section

~~PROPOSED~~ ORDER

For the reasons set forth above, the Defendant's Motion for Early Self-Surrender is DENIED;

For good cause shown, the Arrest Warrant is hereby ordered unsealed and the Government's filing of yesterday in this case shall remain under seal until further order of this Court.

Date: 1/29/16



HON. RICHARD SEEBORG
United States District Judge